

COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR



September 21, 2001

Dr. Scott Masten
Office of Chemical Nomination and Selection
NIEHS/NTP
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Comments on the Substances Nominated to the NTP
for Toxicological Studies and Testing Recommendations;
FR Doc. 01-18481; 66 Fed. Reg. 38,717 (July 25, 2001)

Dear Dr. Masten:

The Brominated Flame Retardant Industry Panel (BFRIP) of the American Chemistry Council (ACC) is pleased to submit the following comments to the National Toxicology Program (NTP) on the substances nominated to the NTP for toxicological studies and on the testing recommendations made by the Interagency Committee for Chemical Evaluation and Coordination (ICCEC) on May 8, 2001. *See 66 Fed. Reg. 38,717 (July 25, 2001)*. The BFRIP is a CHEMSTAR Panel within the ACC and BFRIP's members include U.S. manufacturers and importers of brominated flame retardants (BFRs) as follows: Akzo Nobel Chemicals, Inc., Albemarle Corporation, Ameribrom, Inc., and Great Lakes Chemical Corporation.

On May 8, 2001, the ICCEC made testing recommendations for the following substances (and Chemical Abstracts Service Registry Numbers (CASRN)) listed under the heading of polybrominated diphenyl ethers:

Pentabromodiphenyl ether (technical) [32534-81-9]
Octabromodiphenyl ether (technical) [32536-52-0]
2,2',4,4'-Tetrabromodiphenyl ether [5436-43-1]
2,2',4,4',5-Pentabromodiphenyl ether [60348-60-9]
2,2',4,4',5,5'-Hexabromodiphenyl ether [68631-49-2].

Some of the substances nominated are manufactured and/or imported by BFRIP members. BFRIP actively supports industry and government efforts worldwide to generate, gather and evaluate data that might be useful for a complete and accurate characterization of BFRs. Thus, BFRIP is working cooperatively to support the efforts of the U.S. Environmental Protection Agency (EPA), the European Union and the Organization for Economic Cooperation and Development on various testing initiatives which encompass certain BFRs.



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Dr. Scott Masten
September 21, 2001
Page 2

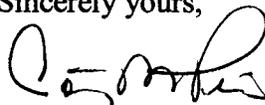
Similarly, BFRIP would be glad to provide technical guidance or assistance if NTP makes a final determination to include some or all of the nominated substances among its list of polybrominated diphenyl ethers recommended for testing.

As a matter of policy, ACC provides copies of final reports of Panel-sponsored research to a number of government agencies, including NTP. BFRIP has sponsored research on a number of the BFRs listed for possible testing. Consequently, NTP has received copies of these reports through BFRIP as the studies were completed. BFRIP would be pleased to provide to NTP a list of any relevant existing studies which are known to BFRIP and which might enhance NTP's efforts in so far as they relate to BFRs.

As you may be aware, EPA also is gathering information concerning certain of the substances nominated by ICCEC, specifically pentabromodiphenyl ether (CASRN 32534-81-9) and octabromodiphenyl ether (CASRN 32536-52-0) pursuant to EPA's Voluntary Children's Chemical Evaluation Program (VCCEP). See 65 Fed. Reg. 81,700 (Dec. 26, 2000). A BFRIP member company, the Great Lakes Chemical Corporation, already has agreed to sponsor testing of these two substances.

If you have any questions, please contact, Wendy K. Sherman, BFRIP Panel Manager, American Chemistry Council, 1300 Wilson Boulevard, Arlington, VA 22205. Phone: 703-741-5639, Fax: 703-741-6091, and E-mail: wendy_sherman@americanchemistry.com.

Sincerely yours,



Courtney M. Price
Vice President, CHEMSTAR